

Filed Under Seal **JFL**

Filed Under Seal (5)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

AHMAD BECOATE
JEFFREY ROACH
JETHRO RICHARDSON
NATHANIEL JONES
JARED MILLER
JUQUAN HARVEY

FILED

JUL 10 2018

KATE BARKMAN, Clerk
By bms Dep. Clerk:

CRIMINAL NO.

18cr 291

DATE FILED:

7/10/18

VIOLATIONS:

18 U.S.C. § 371 (conspiracy) (1 count)
18 U.S.C. § 1343 (wire fraud) (3 counts)
18 U.S.C. § 513(a) (uttering
counterfeit securities) (3 counts)
18 U.S.C. § 1028A (aggravated identity
theft (6 counts)
42 U.S.C. § 408(a)(7)(B) (misuse of a
social security number) (1 count)
18 U.S.C. § 2 (aiding and abetting)
Notice of forfeiture

INDICTMENT

COUNT ONE

(Conspiracy)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

Introduction

1. Walmart, Inc. ("Walmart") was a corporation doing business in interstate commerce that maintained store locations throughout the United States, including in Pennsylvania, Delaware, Maryland and New Jersey.
2. Bank of America ("BoFA") was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), under certificate no. 25178.
3. Bank of Mellon, NY ("BNY") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 7946.

4. Branch Banking & Trust Company ("BB&T") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 9846.
5. Capital One Bank N.A. ("Capital One") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 33954.
6. Central Bank of Jefferson, MO ("Jefferson Bank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 12633.
7. Citibank N.A. was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 7213.
8. Crossfirst Bank ("Crossfirst") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 58648.
9. Deutsche Bank of Delaware ("Deutsche Bank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 26392.
10. First Bank of Southern Pines, NC ("First Bank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 15019.
11. Heritage Bank of Nevada ("Heritage") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 34072.
12. Huntington Bank ("Huntington") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 23758.
13. Iberia Bank ("Iberia") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 28100.
14. International Bank of Commerce ("International") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 19629.

15. JP Morgan Chase Bank ("Chase") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 628.

16. KeyBank N.A. ("KeyBank") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 17534.

17. Pacific City Bank ("Pacific") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 57463.

18. PNC Bank ("PNC") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 6384.

19. Tennessee Valley Federal Credit Union ("TVFCU") was a financial institution, the deposits of which were insured by the National Credit Union Administration ("NCUA"), under certificate no. 1520.

20. Truliant Federal Credit Union ("Truliant FCU") was a financial institution, the deposits of which were insured by the NCUA, under certificate no. 7840.

21. Wells Fargo Bank ("Wells Fargo") was a financial institution, the deposits of which were insured by the FDIC, under certificate no. 25890.

22. The Southeastern Pennsylvania Transportation Authority ("SEPTA") was a regional public transit authority that provided bus, trolley, subway/elevated rail line, commuter and light rail transportation to millions of people in Philadelphia, Delaware, Montgomery, Bucks and Chester Counties.

23. Walmart, SEPTA and the financial institutions listed above at paragraphs 2 through 22 were organizations which operated in, and the activities of which affected, interstate commerce.

24. Fidelity Information Services (“FIS”) was a company that provided, among other things, check management services and solutions for collecting outstanding debts for companies including Walmart and other retail stores. Walmart permitted customers to cash payroll checks at certain of its stores. When a customer presented a payroll check to a Walmart employee for cashing, the customer was required to enter his or her social security number (“SSN”) into a keypad. The Walmart employee scanned the check through a check reader. The account number of the account on which the payroll check was drawn, along with that bank’s routing number, along with the SSN and any other information provided by the customer, was transmitted via interstate wire transmission from the Walmart store’s computer system to FIS’s computer servers located in either Chicago, Illinois or St. Petersburg, Florida. FIS analyzed the data provided, then transmitted an interstate wire communication from its computer servers back to the Walmart store, recommending acceptance or declination of the payroll check.

The Conspiracy

25. Beginning on a date unknown to the grand jury, but believed to be no later than June 2016, and continuing until at least May 2018, the exact dates being unknown to the grand jury, in the Eastern District of Pennsylvania and elsewhere, defendants

**AHMAD BECOATE,
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JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

knowingly and intentionally combined, conspired and agreed with each other and others, both known and unknown to the grand jury, to commit the following offenses against the United States, that is, to

a. knowingly possess and utter counterfeited securities with intent to deceive another person and organization, in violation of Title 18, United States Code, Section 513(a), and

b. knowingly and with the intent to defraud, devise and intend to devise a scheme to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, by means of wire communication in interstate commerce, in violation of Title 18, United States Code, Section 1343.

Manner and Means

26. It was the purpose of the conspiracy for the conspirators to get United States currency from financial institutions and other organizations by fraud, including by creating and passing counterfeit checks and fraudulently using the identification of other people.

27. It was part of the conspiracy that the conspirators fraudulently obtained checks, identifications and bank account and identification information of various people to use in passing and attempting to pass counterfeit checks at Walmart stores throughout the United States.

It was further part of the conspiracy that:

28. The conspirators used counterfeit checks that resembled payroll checks, purportedly drawn upon financial institutions which were organizations that operated in and affected interstate commerce.

29. The conspirators used bank account numbers of actual victim businesses, including SEPTA, which were organizations and operated in and affected interstate commerce.

30. The conspirators flew via commercial airlines to various states including Arizona, Texas and Utah, among others, where they rented cars and drove from place to place to various Walmart stores for the purpose of cashing counterfeit payroll checks.

31. The conspirators presented, attempted to cash, and cashed, counterfeit payroll checks totaling over \$700,000 at various Walmart stores in the Eastern District of Pennsylvania and elsewhere. The presentation of counterfeit payroll checks at Walmart stores caused the checks to be presented for payment to the financial institutions on which the counterfeit checks purported to have been drawn.

Overt Acts

In furtherance of the conspiracy, and to accomplish its objectives, defendants AHMAD BECOATE, JEFFREY ROACH, JETHRO RICHARDSON, NATHANIEL JONES, JARED MILLER, JUQUAN HARVEY and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere: on or about the dates below, the defendants cashed and attempted to cash the counterfeit checks listed, against the business accounts listed, at the Walmart store locations identified, for the amounts and using the social security numbers listed:

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
1	1/5/17	Jeffrey Roach	5887633	\$306.12	Leesburg VA	x1414	PNC	SEPTA
2	1/5/17	Jeffrey Roach	5887618	\$228.26	Leesburg VA	x1414	PNC	SEPTA
3	1/5/17	Jeffrey Roach	5887632	\$307.62	Winchester VA	x1150	PNC	SEPTA
4	1/5/17	Jeffrey Roach	5887614	\$400.82	Winchester VA	x1150	PNC	SEPTA

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
5	1/5/17	Jeffrey Roach	5887629	\$400.41	Winchester VA	x4689	PNC	SEPTA
6	1/5/17	Jeffrey Roach	5887616	\$308.56	Winchester VA	x2160	PNC	SEPTA
7	1/5/17	Jeffrey Roach	5887631	\$305.35	Winchester VA	x2160	PNC	SEPTA
8	1/5/17	Jeffrey Roach	5887619	\$224.62	Front Royal VA	x4470	PNC	SEPTA
9	1/5/17	Jeffrey Roach	5887630	\$306.18	Front Royal VA	x4470	PNC	SEPTA
10	1/5/17	Jeffrey Roach	5887617	\$307.73	Woodstock VA	x6825	PNC	SEPTA
11	1/5/17	Jeffrey Roach	5887621	\$233.26	Woodstock VA	x6825	PNC	SEPTA
12	1/5/17	Jeffrey Roach	5887620	\$233.15	Timberville VA	x2220	PNC	SEPTA
13	1/5/17	Jeffrey Roach	5887626	\$306.25	Timberville VA	x2220	PNC	SEPTA
14	1/5/17	Jeffrey Roach	5887628	\$307.75	Harrisonburg VA	x6156	PNC	SEPTA
15	1/5/17	Jeffrey Roach	5887627	\$308.98	Harrisonburg VA	x6156	PNC	SEPTA
16	1/5/17	Jeffrey Roach	5887622	\$229.00	Harrisonburg VA	x1548	PNC	SEPTA
17	1/5/17	Jeffrey Roach	5887624	\$230.18	Harrisonburg VA	x1548	PNC	SEPTA
18	1/5/17	Jeffrey Roach	5887625	\$229.82	Rockingham VA	x1641	PNC	SEPTA
19	1/5/17	Jeffrey Roach	5887623	\$227.41	Rockingham VA	x1641	PNC	SEPTA
20	1/6/17	Jeffrey Roach	5887665	\$400.85	Staunton VA	x8862	PNC	SEPTA
21	1/6/17	Jeffrey Roach	5887640	\$309.78	Staunton VA	x8862	PNC	SEPTA
22	1/6/17	Jeffrey Roach	5887641	\$308.21	Waynesboro VA	x7780	PNC	SEPTA
23	1/6/17	Jeffrey Roach	5887664	\$225.75	Waynesboro VA	x7780	PNC	SEPTA
24	1/6/17	Jeffrey Roach	5887662	\$400.63	Waynesboro VA	x2090	PNC	SEPTA
25	1/6/17	Jeffrey Roach	5887642	\$307.54	Waynesboro VA	x2090	PNC	SEPTA
26	1/6/17	Jeffrey Roach	5887643	\$307.42	Charlottesville VA	x7391	PNC	SEPTA

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
27	1/6/17	Jeffrey Roach	5887660	\$400.17	Ruckersville VA	x6351	PNC	SEPTA
28	1/6/17	Jeffrey Roach	5887645	\$303.66	Lexington VA	x7950	PNC	SEPTA
29	1/6/17	Jeffrey Roach	5887659	\$228.75	Lexington VA	x7950	PNC	SEPTA
30	1/6/17	Jeffrey Roach	5887658	\$223.20	Roanoke VA	x9409	PNC	SEPTA
31	1/6/17	Jeffrey Roach	5887646	\$306.77	Roanoke VA	x9409	PNC	SEPTA
32	1/6/17	Jeffrey Roach	5887647	\$308.71	Roanoke VA	x7617	PNC	SEPTA
33	1/6/17	Jeffrey Roach	5887657	\$228.85	Roanoke VA	x7617	PNC	SEPTA
34	1/6/17	Jeffrey Roach	5887648	\$307.12	Roanoke VA	x7061	PNC	SEPTA
35	1/6/17	Jeffrey Roach	5887656	\$225.55	Roanoke VA	x7061	PNC	SEPTA
36	1/6/17	Jeffrey Roach	5887655	\$227.18	Roanoke VA	x5404	PNC	SEPTA
37	1/6/17	Jeffrey Roach	5887649	\$309.87	Roanoke VA	x5404	PNC	SEPTA
38	1/6/17	Jeffrey Roach	5887650	\$307.52	Salem VA	x1378	PNC	SEPTA
39	1/6/17	Jeffrey Roach	5887654	\$225.37	Salem VA	x1378	PNC	SEPTA
40	1/6/17	Jeffrey Roach	5887663	\$306.25	Roanoke VA	x2767	PNC	SEPTA
41	1/6/17	Jeffrey Roach	5887652	\$225.60	Bedford VA	x3807	PNC	SEPTA
42	1/6/17	Jeffrey Roach	5887651	\$227.24	Bedford VA	x3807	PNC	SEPTA
43	1/7/17	Ahmad Becoate	5887833	\$228.48	Landover Hills MD	x3850	PNC	SEPTA
44	1/7/17	Ahmad Becoate	5887762	\$305.18	Landover Hills MD	x3850	PNC	SEPTA
45	1/7/17	Ahmad Becoate	5887774	\$306.07	Bowie MD	x1183	PNC	SEPTA
46	1/7/17	Ahmad Becoate	5887767	\$405.89	Bowie MD	x1183	PNC	SEPTA
47	1/7/17	Ahmad Becoate	5887756	\$308.08	Pasadena MD	x7304	PNC	SEPTA
48	1/7/17	Ahmad Becoate	5887764	\$403.95	Pasadena MD	x7304	PNC	SEPTA

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
49	1/7/17	Ahmad Becoate	5887771	\$401.09	Severn MD	x6852	PNC	SEPTA
50	1/7/17	Ahmad Becoate	5887761	\$307.49	Severn MD	x6852	PNC	SEPTA
51	1/7/17	Ahmad Becoate	5887770	\$303.72	Glen Burnie MD	x7880	PNC	SEPTA
52	1/7/17	Ahmad Becoate	5887769	\$404.51	Glen Burnie MD	x7880	PNC	SEPTA
53	1/7/17	Ahmad Becoate	5887765	\$155.01	Glen Burnie MD	x7880	PNC	SEPTA
54	1/8/17	JuQuan Harvey	271230261	\$306.77	Haymarket VA	x7650	Deutsche Bank	Fidelity Management
55	1/8/17	JuQuan Harvey	271230276	\$400.58	Haymarket VA	x7650	Deutsche Bank	Fidelity Management
56	1/8/17	Jeffrey Roach	5887695	\$400.85	Alexandria VA	x8479	PNC	SEPTA
57	1/8/17	Jeffrey Roach	5887670	\$309.78	Alexandria VA	x8479	PNC	SEPTA
58	1/8/17	Jeffrey Roach	5887694	\$400.87	Hybla Valle VA	x7033	PNC	SEPTA
59	1/8/17	Jeffrey Roach	5887690	\$400.58	Alexandria VA	x3287	PNC	SEPTA
60	1/8/17	Jeffrey Roach	5887689	\$400.17	Burke VA	x9118	PNC	SEPTA
61	1/8/17	Jeffrey Roach	5887673	\$307.42	Burke VA	x9118	PNC	SEPTA
62	1/8/17	Jeffrey Roach	5887674	\$305.12	Fairfax VA	x1322	PNC	SEPTA
63	1/8/17	Jeffrey Roach	5887693	\$225.75	Fairfax VA	x1322	PNC	SEPTA
64	1/8/17	Jeffrey Roach	5887675	\$303.66	Fairfax VA	x7910	PNC	SEPTA
65	1/8/17	Jeffrey Roach	5887688	\$228.75	Fairfax VA	x7910	PNC	SEPTA
66	1/8/17	Jeffrey Roach	5887676	\$306.77	Chantilly VA	x5361	PNC	SEPTA
67	1/8/17	Jeffrey Roach	5887687	\$228.85	Chantilly VA	x5361	PNC	SEPTA
68	1/9/17	JuQuan Harvey	271230292	\$308.71	Spotsylvania VA	x1168	Deutsche Bank	Fidelity Management
69	1/9/17	JuQuan Harvey	271230294	\$309.87	Spotsylvania VA	x1168	Deutsche Bank	Fidelity Management
70	1/9/17	Jeffrey Roach	5887677	\$308.71	Greenville NC	x0602	PNC	SEPTA

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
71	1/9/17	Jeffrey Roach	5887686	\$225.55	Greenville NC	x0602	PNC	SEPTA
72	1/9/17	Jeffrey Roach	5887700	\$309.78	Greenville NC	x7399	PNC	SEPTA
73	1/9/17	Jeffrey Roach	5887725	\$400.85	Greenville NC	X7399	PNC	SEPTA
74	1/9/17	Jeffrey Roach	5887721	\$400.63	Greenville NC	x6383	PNC	SEPTA
75	1/9/17	Jeffrey Roach	5887702	\$307.54	Greenville NC	x6383	PNC	SEPTA
76	1/9/17	Jeffrey Roach	5887703	\$307.42	Washington NC	x3874	PNC	SEPTA
77	1/9/17	Jeffrey Roach	5887720	\$400.58	Washington NC	x3874	PNC	SEPTA
78	1/9/17	Jeffrey Roach	5887719	\$400.17	Williamston NC	x6641	PNC	SEPTA
79	1/9/17	Jeffrey Roach	5887704	\$305.12	Williamston NC	x6641	PNC	SEPTA
80	1/17/17	Jethro Richardson	111347	\$216.31	Sioux Falls SD	x5486	First Bank	CBIZ Benefits and Insurance Services
81	1/17/17	Jethro Richardson	111328	\$214.71	Sioux Falls SD	x5486	First Bank	CBIZ Benefits and Insurance Services
82	1/18/17	Jethro Richardson	12415744	\$216.52	Lincoln NE	x9917	Central Bank	ATT Mobility
83	1/18/17	Jethro Richardson	12415755	\$214.37	Lincoln NE	x9917	Central Bank	ATT Mobility
84	1/19/17	Jethro Richardson	214849	\$216.75	Shawnee KS	x0209	PNC	Wal-Mart PA Class
85	1/19/17	Jethro Richardson	214930	\$215.26	Shawnee KS	x0209	PNC	Wal-Mart PA Class
86	1/29/17	Jethro Richardson	11530	\$218.41	Kendallville IN	x2298	Int'l Bank of Commerce	R.B.
87	1/29/17	Jethro Richardson	11530	\$218.41	Kendallville IN	x4957	Int'l Bank of Commerce	R.B.
88	1/29/17	Jethro Richardson	11495	\$220.45	Kendallville IN	x4957	Int'l Bank of Commerce	R.B.

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
89	1/29/17	Jethro Richardson	11495	\$220.45	Kendallville IN	x4957	Int'l Bank of Commerce	R.B.
90	1/29/17	Jethro Richardson	17497	\$217.45	Shelby Township MI	x7370	Wells Fargo	Fresh-point Atlanta Inc.
91	1/29/17	Jethro Richardson	17468	\$214.75	Shelby Township MI	x7370	Wells Fargo	Fresh-point Atlanta Inc.
92	1/29/17	Jethro Richardson	17468	\$214.75	Shelby Township MI	x7178	Wells Fargo	Fresh-point Atlanta Inc.
93	1/30/17	Jethro Richardson	12798	\$219.19	Chandler AZ	x6433	KeyBank	None – fake account
94	1/30/17	Jethro Richardson	11496	\$214.77	Cortez CO	x5393	Int'l Bank of Commerce	R.B.
95	1/31/17	JuQuan Harvey	11518	\$217.77	Fountain CO	X9426	Int'l Bank of Commerce	R.B.
96	2/24/17	Jeffrey Roach	100094205	\$226.66	Stanford KY	x1929	NC State Treasurer	State of North Carolina
97	2/24/17	Jeffrey Roach	100094199	\$307.20	Stanford KY	x1929	NC State Treasurer	State of North Carolina
98	4/12/17	Jeffrey Roach	117006	\$306.24	Unicoi TN	x8376	Wells Fargo	Zazzle Inc.
99	4/12/17	Jeffrey Roach	117016	\$232.55	Unicoi TN	x8376	Wells Fargo	Zazzle Inc.
100	4/12/17	Jeffrey Roach	117006	\$306.24	Unicoi TN	x8376	Wells Fargo	Zazzle Inc.
101	4/12/17	Jeffrey Roach	117008	\$305.91	Johnson City TN	x0569	Wells Fargo	Zazzle Inc.
102	4/12/17	Jeffrey Roach	117015	\$235.15	Johnson City TN	x0569	Wells Fargo	Zazzle Inc.
103	4/18/17	Jeffrey Roach	2446418	\$238.78	Rocky Mount, NC	x8116	BNY Mellon	PECO Energy
104	4/18/17	Jeffrey Roach	2246423	\$170.93	Rocky Mount, NC	x8116	BNY Mellon	PECO Energy
105	4/18/17	Jethro Richardson	16385	\$228.75	Rocky Mount, NC	x4584	Heritage Bank of Nevada	Vroman-Wildes Family Trust
106	4/18/17	Jethro Richardson	16386	\$119.72	Rocky Mount, NC	x4584	Heritage Bank of Nevada	Vroman-Wildes Family Trust

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
107	4/19/17	Jethro Richardson	16345	\$119.52	Cameron NC	x8747	Heritage Bank of Nevada	Vroman-Wildes Family Trust
108	4/19/17	Jethro Richardson	16272	\$227.72	Cameron NC	x8747	Heritage Bank of Nevada	Vroman-Wildes Family Trust
109	4/19/17	Jeffrey Roach	204374	\$307.69	High Point, NC	x2935	PNC	TGSM
110	4/19/17	Jared Miller	204365	\$189.61	High Point, NC	x1605	PNC	TGSM
111	4/20/17	Jared Miller	204384	\$176.75	Greensboro NC	x5105	PNC	Triumph Gear Systems Macomb Inc.
112	4/20/17	Jared Miller	204385	\$186.99	Greensboro NC	x5105	PNC	Triumph Systems Macomb Inc.
113	4/28/17	Nathaniel Jones	592987	\$277.99	Mayodan NC	x4001	Crossfirst	FQSR LLC
114	4/28/17	Nathaniel Jones	592987	\$277.99	Mayodan NC	x2574	Crossfirst	FQSR LLC
115	4/28/17	Nathaniel Jones	593333	\$168.55	Mayodan NC	x2574	Crossfirst	FQSR LLC
116	4/28/17	Nathaniel Jones	593333	\$168.55	Mayodan NC	x6415	Crossfirst	FQSR LLC
117	4/28/17	Jethro Richardson	11857	\$119.37	Madison Heights VA	x6491	PNC	Ulery Dental and Ortho
118	4/28/17	Jethro Richardson	11758	\$220.47	Madison Heights VA	x6491	PNC	Ulery Dental and Ortho
119	5/1/17	Jared Miller	613360	\$177.47	Kannapolis NC	x5999	Tennessee Valley FCU	None-fake account
120	5/1/17	Jared Miller	613527	\$185.71	Kannapolis NC	x5999	Tennessee Valley FCU	None-fake account
121	5/1/17	Jared Miller	613527	\$185.71	Kannapolis NC	x4336	Tennessee Valley FCU	None-fake account
122	5/1/17	Jared Miller	613528	\$184.76	Asheboro NC	x7517	Tennessee Valley FCU	None-fake account
123	5/1/17	Jared Miller	613362	\$174.28	Asheboro NC	x7517	Tennessee Valley FCU	None-fake account

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
124	5/1/17	Jared Miller	613529	\$186.37	Lexington NC	x2334	Tennessee Valley FCU	None-fake account
125	5/1/17	Jared Miller	613361	\$178.56	Lexington NC	x2334	Tennessee Valley FCU	None-fake account
126	5/9/17	Jeffrey Roach	874395	\$312.14	Somersworth NH	x6992	Huntington National Bank	Mahoning County Treasurer
127	5/9/17	Jeffrey Roach	874389	\$239.77	Somersworth NH	x6992	Huntington National Bank	Mahoning County Treasurer
128	5/13/17	Jethro Richardson	11648	\$118.56	Huntsville AL	x5117	Bank of America	Gulf Coast Tropical Fruit & Produce Co.
129	5/13/17	Jethro Richardson	11517	\$218.72	Huntsville AL	x5117	Bank of America	Gulf Coast Tropical Fruit & Produce Co.
130	5/13/17	Jethro Richardson	11651	\$118.56	Madison AL	x2146	Bank of America	Gulf Coast Tropical Fruit & Produce Co.
131	5/13/17	Jethro Richardson	11515	\$217.62	Madison AL	x2146	Bank of America	Gulf Coast Tropical Fruit & Produce Co.
132	5/13/17	Jethro Richardson	11515	\$217.62	Madison AL	x4346	Bank of America	Gulf Coast Tropical Fruit & Produce Co.
133	5/13/17	Jethro Richardson	12479	\$119.46	Huntsville AL	x1770	Pacific City Bank	Feng Mao Inc.
134	5/13/17	Jethro Richardson	12322	\$218.56	Huntsville AL	x1770	Pacific City Bank	Feng Mao Inc.
135	6/2/17	Nathaniel Jones	1009769928	\$296.44	South Boston VA	x6865	Chase	Paylocity Corp.
136	6/2/17	Nathaniel Jones	1009769926	\$168.55	South Boston VA	x6865	Chase	Paylocity Corp.
137	7/24/17	Jeffrey Roach	766454	\$228.22	Houston TX	x9700	Wells Fargo	Whole Foods Market
138	7/24/17	Jeffrey Roach	766449	\$308.35	Houston TX	x9700	Wells Fargo	Whole Foods Market
139	7/24/17	Jeffrey Roach	766448	\$224.12	Houston TX	x9700	Wells Fargo	Whole Foods Market
140	8/20/17	Jeffrey Roach	41616162	\$230.02	North Little Rock AR	x5330	Bank of America	Liberty Mutual Insurance

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
141	9/12/17	Jeffrey Roach	1003457	\$308.63	Spotsylvania VA	x4279	BB&T Bank	SNM Foods
142	9/12/17	Jeffrey Roach	1003453	\$232.36	Spotsylvania VA	x4279	BB&T Bank	SNM Foods
143	9/20/17	Jeffrey Roach	614156	\$242.69	Colorado Springs CO	x8277	Chase	BL Restaurant Operations LLC
144	9/20/17	Jeffrey Roach	614508	\$234.34	Colorado Springs CO	x8277	Chase	BL Restaurant Operations LLC
145	9/22/17	JuQuan Harvey	20928	\$242.83	Dulles VA	x0741	BB&T	The Lodge A Sportsman Grill 2 LLC
146	9/22/17	JuQuan Harvey	21275	\$233.45	Dulles VA	x0741	BB&T	The Lodge A Sportsman Grill 2 LLC
147	9/23/17	Jeffrey Roach	1003811	\$233.45	Layton UT	x3406	BB&T	SNM Foods
148	9/23/17	Jeffrey Roach	1003461	\$242.83	Layton UT	x3406	BB&T	SNM Foods
149	9/30/17	JuQuan Harvey	5184579	\$244.55	Seaford DE	x0812	Wells Fargo	BCBS of NC
150	9/30/17	JuQuan Harvey	5184917	\$233.45	Seaford DE	x0812	Wells Fargo	BCBS of NC
151	9/30/17	Jeffrey Roach	30893	\$245.10	Columbus OH	x8333	Truliant FCU	Phillippi Investments Inc.
152	9/30/17	Jeffrey Roach	30893	\$245.10	Columbus OH	x8333	Truliant FCU	Phillippi Investments Inc.
153	9/30/17	Jeffrey Roach	30893	\$245.10	Columbus OH	x8333	Truliant FCU	Phillippi Investments Inc.
154	9/30/17	Ahmad Becoate	30883	\$247.20	Columbus OH	x3967	Truliant FCU	Phillipi Investments, Inc.
155	9/30/17	Jeffrey Roach	56010060	\$245.10	Columbus OH	x2687	Wells Fargo	Spruce LTC Group LLC
156	9/30/17	Jeffrey Roach	56010060	\$245.10	Columbus OH	x2758	Wells Fargo	Spruce LTC Group LLC
157	10/28/17	Jeffrey Roach	690330	\$283.45	Lewisburg PA	x4558	Wells Fargo	American Sugar Refining Inc.
158	10/28/17	Jeffrey Roach	690333	\$226.76	Lewisburg PA	x4558	Wells Fargo	American Sugar Refining Inc.

Overt Act	Date	Defendant	Check No.	Amount	Walmart Location	SSN	Alleged Drawee Bank	Alleged Account Holder
159	10/31/17	Ahmad Becoate	690203	\$331.75	Oak Grove MO	x6382	Wells Fargo	American Sugar Refining Inc.
160	10/31/17	Ahmad Becoate	690205	\$220.25	Oak Grove MO	x6382	Wells Fargo	American Sugar Refining Inc.
161	11/22/17	Ahmad Becoate	22042999	\$188.53	Eddystone PA	x8124	Iberia Bank	Calcasieu Parish School Board
162	12/8/17	Ahmad Becoate	1398268	\$220.23	Davenport IA	x8892	Wells Fargo	Target Corp.
163	12/8/17	Ahmad Becoate	1398254	\$195.10	Davenport IA	x8892	Wells Fargo	Target Corp.
164	12/14/17	Ahmad Becoate	485987	\$205.85	Fort Wright KY	x5806	Wells Fargo	CSL Plasma Inc.
165	12/14/17	Ahmad Becoate	485981	\$196.36	Fort Wright KY	x5806	Wells Fargo	CSL Plasma Inc.
166	12/19/17	Nathaniel Jones	51234497	\$229.02	Winston-Salem NC	x1866	NC State Treasurer	State of NC
167	12/19/17	Nathaniel Jones	51234450	\$199.99	Winston-Salem NC	x1866	NC State Treasurer	State of NC
168	5/8/18	Jeffrey Roach	653379	\$150.40	Parkessburg PA	x0048	Capital One	C.C.
169	5/8/18	Jeffrey Roach	653379	\$150.40	Parkessburg PA	x0048	Capital One	C.C.
170	5/8/18	Jeffrey Roach	70054927	\$237.40	Lancaster PA	x6102	Citibank	CMGRP, Inc.
171	5/8/18	Jeffrey Roach	70054875	\$439.65	Lancaster PA	x6102	Citibank	CMGRP, Inc.
172	5/8/18	Jeffrey Roach	70054962	\$146.37	East Lampeter PA	x1683	Citibank	CMGRP, Inc.

173. On or about January 19, 2017, in the Eastern District of Pennsylvania, defendant AHMAD BECOATE rented a vehicle from a car rental agency in Philadelphia and used it to

drive to various Walmart stores in Delaware, Pennsylvania, Ohio, Indiana and Michigan in order to cash counterfeit payroll checks.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH FOUR

(Wire Fraud)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraphs 1 through 24 of Count One are incorporated here.

THE SCHEME

2. Beginning at a date unknown to the grand jury, but believed to be no later than June 2016, and continuing until at least May 2018, the exact dates being unknown to the grand jury, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

devised and intended to devise a scheme to defraud Walmart, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

2. The defendants fraudulently obtained checks, identifications and bank account and identification information of various individuals to use in passing and attempting to pass counterfeit checks at Walmart stores throughout the United States.

3. The defendants used counterfeit checks that resembled payroll checks, purportedly drawn upon financial institutions, which were organizations that operated in and affected interstate commerce.

4. The defendants used bank account numbers of actual victim businesses, including SEPTA, which were organizations and operated in and affected interstate commerce.

5. The defendants flew via commercial airlines to various states including Arizona, Texas and Utah, among others, where they rented cars and drove from place to place to various Walmart stores for the purpose of cashing counterfeit payroll checks.

6. The defendants presented, attempted to cash, and cashed, counterfeit payroll checks at various Walmart stores in the Eastern District of Pennsylvania and elsewhere. The presentation of counterfeit payroll checks at Walmart stores caused the checks to be presented for payment to the financial institutions on which the counterfeit checks purported to be drawn.

7. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

for the purpose of executing the scheme, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION OF WIRE
2	November 22, 2017	electronic transmission of counterfeit check information and fraudulent identification information from Walmart store in Eddystone PA to FSI's servers in St. Petersburg FL and Chicago IL
3	May 8, 2018	electronic transmission of counterfeit check information and fraudulent identification information from Walmart store in Parkesburg PA to FSI's servers in St. Petersburg FL and Chicago IL

4	May 8, 2018	electronic transmission of counterfeit check information and fraudulent identification information from Walmart store in Lancaster PA to FSI's servers in St. Petersburg FL and Chicago IL
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In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT FIVE

(Uttering Counterfeit Securities of an Organization)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraph 23 of Count One is incorporated here.
2. On or about November 22, 2017, at Eddystone, in the Eastern District of Pennsylvania, defendant

AHMAD BECOATE

knowingly and with intent to deceive, possessed and uttered a counterfeited security of an organization operating in and affecting interstate commerce, that is, a counterfeit check in the amount of \$188.53, purporting to be drawn on an account in the name of C.P. School Board at Iberia Bank, which the defendant presented at a Walmart in Eddystone, Pennsylvania, an organization operating in interstate commerce, to cash.

In violation of Title 18, United States Code, Section 513.

COUNT SIX

(Uttering Counterfeit Securities of an Organization)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraph 23 of Count One is incorporated here.
- 2, On or about May 8, 2018, at Parkesburg, in the Eastern District of Pennsylvania,
defendant

JEFFREY ROACH

knowingly and with intent to deceive, possessed and uttered a counterfeited security of an organization operating in and affecting interstate commerce, that is, a counterfeit check in the amount of \$150.40, purporting to be drawn on an account at Capital One Bank, which the defendant presented at a Walmart in Parkesburg, Pennsylvania, an organization operating in interstate commerce, to cash.

In violation of Title 18, United States Code, Section 513.

COUNT SEVEN

(Uttering Counterfeit Securities of an Organization)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraph 23 of Count One is incorporated here.
- 2, On or about May 8, 2018, at Lancaster, in the Eastern District of Pennsylvania,
defendant

JEFFREY ROACH

knowingly and with intent to deceive, possessed and uttered a counterfeited security of an organization operating in and affecting interstate commerce, that is, a counterfeit check in the amount of \$439.56, purporting to be drawn on an account in the name of CMGRP, Inc. at Citibank, which the defendant presented at a Walmart in Lancaster, Pennsylvania, an organization operating in interstate commerce, to cash.

In violation of Title 18, United States Code, Section 513.

COUNT EIGHT

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about September 30, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

AHMAD BECOATE

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of R.B., ending in 3967, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT NINE

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about May 9, 2017 in the Eastern District of Pennsylvania and elsewhere,
defendant

JEFFREY ROACH

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of K. W., ending in 6992, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TEN

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about April 18, 2017 in the Eastern District of Pennsylvania and elsewhere,

defendant

JETHRO RICHARDSON

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of J.S., ending in 4584, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT ELEVEN

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about December 19, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

NATHANIEL JONES

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of G.H., ending in 1866, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT TWELVE

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about April 19, 2017 in the Eastern District of Pennsylvania and elsewhere,
defendant

JARED MILLER

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of K.W., ending in 1605, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THIRTEEN

(Aggravated Identity Theft)

THE GRAND JURY CHARGES FURTHER THAT:

On or about January 31, 2017 in the Eastern District of Pennsylvania and elsewhere, defendant

JUQUAN HARVEY

knowingly possessed and used, without lawful authority, the means of identification of another person, namely, the Social Security number of W.N., ending in 9426, during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FOURTEEN

(Social Security Fraud)

THE GRAND JURY CHARGES FURTHER THAT:

1. Paragraphs 1 through 24 and 26 through 31 and the Overt Acts of Count One are incorporated here.

2. On or about November 22, 2017, in the Eastern District of Pennsylvania, defendant

AHMAD BECOATE

with intent to deceive, and for the purpose of cashing a counterfeit check at a Walmart store in Eddystone Pennsylvania, falsely represented that a Social Security number ending in 8124 had been assigned to him by the Commissioner of Social Security when in fact such number was not the Social Security number assigned to him.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

NOTICE OF FORFEITURE

THE GRAND JURY CHARGES FURTHER THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 513 and 1343 charged in this Indictment, defendants

**AHMAD BECOATE,
JEFFREY ROACH,
JETHRO RICHARDSON,
NATHANIEL JONES,
JARED MILLER, and
JUQUAN HARVEY**

shall forfeit to the United States of America any property which constitutes or is derived from proceeds obtained directly or indirectly from the commission of such offenses, including but not limited to:

(a) as to defendant AHMAD BECOATE, the sum of \$132,739.11 in United States currency;

(b) as to defendant JEFFREY ROACH, the sum of \$190,587.13 in United States currency;

(c) as to defendant JETHRO RICHARDSON, the sum of \$86,650.62 in United States currency;

(d) as to defendant NATHANIEL JONES, the sum of \$8,198.47 in United States currency;

(e) as to defendant JARED MILLER, the sum of \$4,378.83 in United States currency; and

(f) as to defendant JUQUAN HARVEY, the sum of \$18,559.16 in United States currency.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by 982(b), to seek forfeiture of any property of said defendant up to the value of said property listed above as being subject to forfeiture.

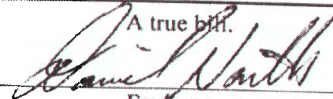
All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


GRAND JURY FOREPERSON


for **WILLIAM M. McSWAIN**
United States Attorney

A true bill.



Foreman

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____